

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Related to Docket Nos. 1351, 1435

**JOINDER OF CORE SHOPPES AT GLOUCESTER LLC, CORE HIGHLAND PLAZA LLC, CORE WHISPERING PINES LLC, AND CORE NORTH HILLS ONE LLC TO LIMITED OBJECTION, AND JOINDER TO OBJECTIONS, OF LAFAYETTE STATION LLC, SOUTH OAKS STATION LLC AND FIVE TOWN STATION LLC TO MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) EXTENDING TIME TO ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY AND (II) GRANTING RELATED RELIEF**

Core Shoppes at Gloucester LLC, Core Highland Plaza LLC, Core Whispering Pines LLC, and Core North Hills One LLC (collectively, the “**Landlords**”) file this Joinder to the *Limited Objection, and Joinder to Objections, of Lafayette Station LLC, South Oaks Station LLC and Five Town Station LLC to Motion of Debtors for Entry of an Order (I) Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief* (the “**Objection**”) [D.I. 1435] and state as follows:

**BACKGROUND**

1. On September 9, 2024 (the “**Petition Date**”), the above-captioned debtors (the

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

“Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

2. As of the Petition Date, the Landlords were parties to leases with the Debtors for the following locations (together, the “**Leases**”):

- (a) Core Shoppes at Gloucester LLC: 6569 Market Drive, Gloucester, VA 23061;
- (b) Core Highland Plaza LLC: 3901 Hixon Pike, Chattanooga, TN 37415; and
- (c) Core Whispering Pines LLC and Core North Hills One LLC: 613 US 62, Harrison, AR 72601.

3. Based on the Landlords’ records, outstanding post-petition stub rent amounts are owed in connection with each of the Leases, in the approximate amount of \$38,272.12.

4. On December 13, 2024, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief* [D.I. 1351] (the “**Extension Motion**”) seeking to extend the deadline to assume or reject unexpired leases of nonresidential real property (the “**365(d)(4) Deadline**”) from January 7, 2025 to April 7, 2025.

5. While the Landlords do not oppose a shorter extension of the 365(d)(4) Deadline, before *any* further extension of the 365(d)(4) Deadline is permitted, immediate assurance is needed regarding, *inter alia* (i) the timing of satisfaction of post-petition amounts owed to the Landlords, (ii) the timing of payment of stub rent, and (iii) the existence of an agreed DIP budget contemplating timely satisfaction of go-forward rent obligations.

6. For these reasons, the Landlords join in the Objection to the Extension Motion and further join in the objections to the Extension Motion filed by any other landlords to the extent consistent with this Joinder, as if set forth in detail herein.

**RESERVATION OF RIGHTS**

7. The Landlords reserve the right to amend or supplement this Joinder and make such other and further objections as may be necessary or appropriate, whether at or prior to the hearing on the Extension Motion, including to any proposed form of order.

**CONCLUSION**

8. The Landlords respectfully request that the Court deny the Extension Motion unless the relief sought is modified in the manner set forth herein, and grant such other and further relief as is may be just and equitable under the circumstances.

Dated: December 27, 2024

**SAUL EWING LLP**

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